

1/5/2009 Huber, Elisabeth

1 individuals, and I'll start with Warren. Were
2 there ever any problems with transactions handled
3 by Warren Gibson --

4 A I never had --

5 Q -- that you recall?

6 A -- personally any problems with Warren at all.

7 Q Were there ever any transactions that raised a
8 question or a concern at Trek, to your knowledge?

9 A Not that I'm aware of.

10 Q What about Muffy?

11 A None. No problems at all.

12 Q What about Bernie?

13 A Same. No problems at all.

14 Q How did you know about Mr. LeMond's ability to
15 buy Trek products at employee discount pricing?

16 Just in -- just due to your position and what you
17 were being asked to do?

18 A When I was approached to take over the position,
19 it was explained to me that he at that juncture
20 was allowed ten free bicycles a year as part of
21 his contract and that then he would often
22 purchase products for friends or media contacts,
23 sometimes a touring company person, and then he
24 also would personally choose to sponsor some
25 teams and extend his discount to them.

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1 Q Do you recall who explained this to you?

2 A Laurie Koch and Dean Gore.

3 Q How frequently would you say Trek shipped
4 products purchased to people other than
5 Mr. LeMond but that were Mr. LeMond's employee
6 pricing purchases?

7 It's a terrible question. Do you
8 understand it?

9 A Yeah, I do understand it.

10 I've never tallied it up. I
11 would -- so I -- I don't know that I could give
12 you a distinct number.

13 Q What -- could you guess a percentage of the total
14 bikes that Mr. LeMond purchased using employee
15 pricing?

16 A That went to others?

17 Q Correct.

18 A I would probably say close to 70 percent went to
19 others.

20 Q Are you aware of instances where bikes purchased
21 on Mr. LeMond's account were resold?

22 A No, I'm unaware of anything specifically.

23 Q Do you have an understanding of the involvement
24 of the dealers in Mr. LeMond's use of the
25 employee discount program?